

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**THE DAILY WIRE, LLC;**

**FDRLST MEDIA, LLC; and**

**THE STATE OF TEXAS, by and through its  
Attorney General, Ken Paxton,**

*Plaintiffs,*

v.

**DEPARTMENT OF STATE;**

**GLOBAL ENGAGEMENT CENTER;**

**ANTONY BLINKEN, in his official capacity as  
Secretary of State;**

**LEAH BRAY, in her official capacity as Deputy  
Coordinator of the State Department's Global  
Engagement Center;**

**JAMES P. RUBIN, in his official capacity as  
Coordinator for the Global Engagement Center of the  
State Department;**

**DANIEL KIMMAGE, in his official capacity as the  
Principal Deputy Coordinator for the Global  
Engagement Center at the State Department;**

**ALEXIS FRISBIE, in her official capacity as Senior  
Technical Advisor of the Technology Engagement  
Team for the Global Engagement Center at the State  
Department;**

**PATRICIA WATTS, in her official capacity as the  
Director of the Technology Engagement Team at the  
Global Engagement Center at the State Department,**

*Defendants.*

**Civil Action No.: 6:23-cv-00609**

**[PROPOSED] ORDER**

Before the Court is the motion of Plaintiffs, The Daily Wire, LLC, FDRLST Media, LLC, and the State of Texas, for Expedited Preliminary-Injunction-Related Discovery. After considering the Motion, the Court finds good cause supports Plaintiffs' request for limited Preliminary-Injunction-Related Expedited Discovery and therefore the Motion is hereby **GRANTED**.

It is hereby **ORDERED** that:

1. Within five business days of this Court's ruling on this Motion, Plaintiffs may serve interrogatories and document requests on Defendants and may serve no more than five subpoenas on third parties.
2. Defendants and third parties shall provide responses and objections within thirty days of service.
3. Within ten days of the receipt of the responses, objections, and the production of responsive documents, the parties shall meet and confer in good faith about any discovery dispute, after which the parties shall submit a joint statement to the Court identifying the nature of any unresolved dispute.
4. Within ten days of the receipt of the responses, objections, and any responsive documents, Plaintiffs shall notify Defendants whether they will seek additional third-party subpoenas or depositions pursuant to Rule 30(a)(2) of the Federal Rules of Civil Procedure.
5. Within seven days of receiving notice of the depositions and additional third-party subpoenas sought by Plaintiffs, the parties shall meet and confer regarding the additional discovery requests. Should the parties reach an impasse, they shall submit

- separate statements to the Court stating their positions on each requested subpoena and deposition.
6. Thereafter, this Court shall determine any outstanding discovery disputes, after which Plaintiffs will have ten days to serve any additional third-party subpoenas and thirty days to complete any authorized depositions.
  7. Within twenty days after all authorized depositions are taken, Plaintiffs may supplement their previous memoranda in support of their Motion for a Preliminary Injunction.
  8. Within twenty days after Plaintiffs file their supplemental memorandum, Defendants may file a supplemental memorandum in response to the Motion for Preliminary Injunction.
  9. Within ten days after Defendants file their supplemental memorandum, Plaintiffs may file a reply.

So **ORDERED** and **SIGNED** this \_\_\_\_ day of \_\_\_\_\_, 2024.

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JEREMY D. KERNODLE  
UNITED STATES DISTRICT JUDGE